

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CAREPOINT HEALTH
MANAGEMENT ASSOCIATES LLC,
et al.,

Plaintiffs,

v.

RWJ BARNABAS HEALTH, INC.,

Defendant.

Hon. Evelyn Padin, U.S.D.J

Hon. Cathy L. Waldor, U.S.M.J.

Civil Action No.

2:22-cv-05421-EP-CLW

Return Date: September 3, 2024

**PLAINTIFFS' NOTICE OF MOTION TO
DISQUALIFY COUNSEL**

PLEASE TAKE NOTICE that Plaintiffs CarePoint Health Management Associates, LLC d/b/a CarePoint Health (“CarePoint Health”); Hudson Hospital OPCO, LLC d/b/a CarePoint Health – Christ Hospital (“Christ Hospital”); IJKG, LLC, IJKG PROPCO, LLC and IJKG OPCO, LLC d/b/a CarePoint Health – Bayonne Medical Center (“Bayonne Medical”) and HUMC OPCO, LLC d/b/a CarePoint Health – Hoboken University Medical Center (“HUMC”) (together “Plaintiffs” or “CarePoint”), through their attorneys, Dilworth Paxson LLP, hereby moves this Court to enter an order to disqualify Proskauer Rose LLP as counsel for Defendant, RWJ Barnabas Health, Inc. (“Defendant” or “Barnabas”) pursuant to L.Civ.R. 103.1(a) and RPC 1.9.

PLEASE TAKE FURTHER NOTICE that in support of their motion, Plaintiffs shall rely on the accompanying Memorandum of Law, Exhibits, and Certification of Lisa J. Rodriguez.

PLEASE TAKE FURTHER NOTICE that, pursuant to L.Civ.R. 78.1, the Motion date is September 3, 2024.

PLEASE TAKE FURTHER NOTICE that, pursuant to L.Civ.R. 78.1, the Plaintiffs respectfully request oral argument on their Motion.

Respectfully submitted,

/s/ Lisa J. Rodriguez

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**Admitted Pro Hac Vice*

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 9, 2024, a true and correct copy of the foregoing Motion to Disqualify was served electronically via the Court's ECF system on all counsel of record.

Dated: August 9, 2024

DILWORTH PAXSON LLP

BY: /s/ Lisa Rodriguez
Lisa Rodriguez, Esquire